

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
vs.	)	No. 07 CR 50059
	)	Judge Frederick J. Kapala
ROBERT H. SWEENEY	)	

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**DEFENDANT'S MOTION FOR LEAVE TO FILE  
UNDER SEAL MITIGATION REPORT**

Defendant ROBERT H. SWEENEY, by the FEDERAL DEFENDER PROGRAM  
TERENCE F. MACCARTHY EXECUTIVE DIRECTOR PROGRAM and PAUL E.  
GAZIANO, one of his assistants, and respectfully requests that this Court allow a  
MITIGATION REPORT regarding ROBERT SWEENEY to be filed under seal.

This matter is currently set for hearing on July 31, 2008 at 9:30 a.m. In support of  
this motion, Mr. Sweeney states:

1. Mr. Sweeney wishes to provide the Court with complete and accurate  
information about himself while preserving his right to maintain the  
confidentiality of his medical records, physical and mental condition, and  
certain other matters.
2. Mr. Sweeney seeks to protect the confidentiality of his conditions from  
entry into the public record.

3. Counsel for the government, Mark Karner, has been contacted regarding this motion and does not have any objections to it.

WHEREFORE, the Defendant requests that this court issue an order granting him leave to file the mitigation report under seal.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM  
Terence F. MacCarthy,  
Executive Director

BY:\_\_\_\_\_/s\_\_\_\_\_  
Paul E. Gaziano  
Attorney for Robert H. Sweeney

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